

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**In re:**

**JOHN AUBREY COONEY, JR.,**

**Debtor.**

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**Chapter 13**

**Case No. 23-12823-MDC**

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the attorneys set forth below, hereby appear as counsel for Montgomery County Tax Claim Bureau (“MCTCB”), and pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned requests that an entry be made on the Clerk’s Service List, in the above captioned case, and that all notices given or required to be given and all papers served or required to be served, in this case be given to and served upon:

Michael D. Vagnoni, Esquire  
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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier services, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (a) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in this case, with

respect to (a) the debtors, (b) property of the debtor's estate, or proceeds thereof, in which the debtors may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtors may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by the undersigned.

**PLEASE TAKE FURTHER NOTICE** that MCTCB does not intend for this entry of appearance or any later appearance, pleading, claim, or suit to constitute a waiver of (1) the right of MCTCB to have final orders in non-core matters entered only after de novo review by the District Court, (2) the right of MCTCB to a trial by jury in any proceeding so triable in this case or in any case, controversy or proceeding related to this case, (3) the right of MCTCB to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other right, claim, action, defense, set off or recoupment to which MCTCB is or may be entitled.

Respectfully submitted,

Dated: September 21, 2023

By: /s/ Michael D. Vagnoni  
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